

LAW OFFICES OF RACHEL BLUMENFELD  
Attorneys for McCoy Consultants, Ltd.,  
d/b/a McCoy Companies Inc.  
Debtor-In-Possession  
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RACHEL BLUMENFELD (RB-1458)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT NEW YORK

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In re:	:	
	:	<b>Chapter 11 Case No:</b>
	:	<b>8-09-76222 (AST)</b>
McCOY CONSULTANTS, LTD.,	:	
d/b/a McCOY COMPANIES INC.	:	
	:	
Debtor-In-Possession	:	
-----X	:	

**DEBTOR'S OPPOSITION TO TRUSTEE'S MOTION  
TO CONVERT OR DISMISS THIS CHAPTER 11 CASE**

The opposition of **McCOY CONSULTANTS, LTD., d/b/a McCOY COMPANIES INC.**, the Debtor and Debtor-in-Possession (the "Debtor"), by its attorneys **THE LAW OFFICE OF RACHEL BLUMENFELD**, to the motion of **THE UNITED STATES TRUSTEE FOR REGION 2** (the "United States Trustee") for its motion to convert or dismiss this chapter 11 case (the "Motion"), respectfully represents as follows:

1. The Debtor has filed all outstanding monthly operating reports of August 2009 through and including January 2010 (See ECF Docket Numbers 38 through 43).
2. The Debtor's principal has advised me that no later than at the hearing for the United States Trustee's Motion the Debtor is willing and able to make the quarterly fee payments due to the Office of the United States Trustee for the third and fourth quarters of 2009.

3. The Debtor does not believe it has had the proper opportunity afforded by the Bankruptcy Code to reorganize its affairs. Since the filing of the instant bankruptcy case the Debtor was required to deal with its eviction from its premises, and the Debtor was required to go through the expense and upheaval associated with moving its practice two times. The Debtor asks that the Court exercise its equitable powers in allowing it to remain in a Chapter 11 proceeding.

**WHEREFORE**, the Debtor prays for the Motion by The Office of the United States Trustee to be denied in its entirety, and for the Debtor to have the opportunity to reorganize its affairs. In the event the Court is inclined to grant the Motion of the Office of the United States Trustee, the Debtor prays that the Court dismiss the instant case and not convert it to a chapter 7 proceeding; and for such other relief as is proper and just in this matter.

Dated: Brooklyn, New York  
February 23, 2010

**LAW OFFICE OF RACHEL BLUMENFELD**  
Attorneys for McCoy Consultants, Ltd.  
d/b/a McCoy Companies Inc.

By: /s/ Rachel S. Blumenfeld  
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